



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Allred, Director

October 4, 2002

CERTIFIED MAIL No. 7000 1670 0013 9128 7734

Bill Rutherford
Environmental Manager
J.R. Simplot Co., Food Group
P.O. Box 1059
Caldwell, ID 83606

RE: AIRS Facility No. 027-00009, J.R. Simplot Co., Caldwell
Final Tier I Operating Permit

Dear Mr. Rutherford:

The Idaho Department of Environmental Quality is issuing Tier I Operating Permit No. 027-00009 for the J.R. Simplot Co. Caldwell facility in accordance with the Title V of the Clean Air Act and IDAPA 58.01.01.300 through 386, *Rules for the Control of Air Pollution in Idaho (Rules)*.

The enclosed permit is effective immediately, summarizes the applicable requirements for your facility, and requires an annual compliance certification for all emissions units.

The enclosed operating permit is based on the information contained in your revised permit application, received February 1, 1999. Modifications to and/or renewal of this operating permit shall be requested in a timely manner in accordance with the *Rules*.

Tom Krinke of the Boise Regional Office will contact you regarding a meeting with the Department to discuss the permit terms and requirements. In addition to your facility's plant manager, the Department recommends the following representatives attend the meeting: your responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with the permit conditions.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to IDAPA 58.01.23, *Rules of Administrative Procedure Before the Board of Environmental Quality*. A petition may be filed with the Hearings Coordinator, Department of Environmental Quality, 1410 N. Hilton, Boise, ID 83706-1255, within 35 days of the date of this decision. However, prior to filing a petition for a contested case, the Department encourages you to contact Bill Rogers at (208) 373-0502 or wrogers@deq.state.id.us to address any questions or concerns you may have with the enclosed permit.

Sincerely,


Katherine B. Kelly
Administrator
Air Quality Division

KK/tk Project No. T1-9505-059-1 G:\AIR QUALITY\STATIONARY SOURCE\SS LTD\T1\JRS CLDWLL\FINAL\JRS CALDWELL FINAL PL.DOC

Enclosure

cc: Sherry Davis, Technical Services Division Mike McGown, Boise Regional Office Laurie Kral, EPA - Region 10



Air Quality
TIER I OPERATING PERMIT
State of Idaho
Department of Environmental Quality

PERMIT NO.: 027-00009

AQCR: 64 **CLASS:** A

SIC: 2037 **ZONE:** 11

UTM COORDINATE (km): 521.5 , 4835.0

1. PERMITTEE

J.R. Simplot Co., Food Group

2. PROJECT

Tier I Operating Permit

3. MAILING ADDRESS

P.O. Box 1059

CITY

Caldwell

STATE

ID

ZIP

83606

4. FACILITY CONTACT

Bill Rutherford

TITLE

Environmental Manager

TELEPHONE

(208) 454-4360

5. RESPONSIBLE OFFICIAL

Reggie Pederson

TITLE

Unit Director

TELEPHONE

(208) 459-0071

6. EXACT PLANT LOCATION

Two miles west of Caldwell on Highway 19

COUNTY

Canyon

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Potato processing/Ethanol production

8. PERMIT AUTHORITY

This Tier I operating permit is issued pursuant to Idaho Code §39-115 and the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.300 through 386. The permittee shall comply with the terms and conditions of this permit.

This permit incorporates all applicable terms and conditions of prior air quality permits issued by the Idaho Department of Environmental Quality for the permitted source, unless the permittee emits toxic pollutants subject to state-only requirements pursuant to IDAPA 58.01.01.210, and the permittee elects not to incorporate those terms and conditions into this operating permit.

The effective date of this permit is the date of signature by the Department on the cover page.


KATHERINE B. KELLY, ADMINISTRATOR, AIR QUALITY DIVISION
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: October 4, 2002

DATE EXPIRES: October 4, 2005

TABLE OF CONTENTS

LIST OF ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE	3
1. FACILITY-WIDE CONDITIONS.....	4
2. EMISSIONS UNIT/Production Lines No. 1, 4, and 6	13
3. EMISSIONS UNIT/Steam Generating Plant.....	17
4. EMISSIONS UNIT/Heater S-C-H5	18
5. EMISSIONS UNIT/Biogas Unit.....	19
6. EMISSIONS UNIT/Ethanol Production Plant	22
7. INSIGNIFICANT ACTIVITIES.....	24
8. COMPLIANCE SCHEDULE	25
9. TIER I OPERATING PERMIT GENERAL PROVISIONS	27

LIST OF ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
COD	chemical oxygen demand
Department	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
ESP	electrostatic precipitator
gr	grain (1 lb = 7,000 grains)
gr/dscf	grains per dry standard cubic foot
HAPs	hazardous air pollutants
H ₂ S	hydrogen sulfide
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometers
lb/hr	pounds per hour
lb/mo	pounds per month
O&M	operations and maintenance
MMBtu/hr	million British thermal units per hour
mmHg	millimeters of mercury
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O ₂	oxygen
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter of ten micrometers or less
ppmv	parts per million by volume
PTC	permit to construct
PW	process weight
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO ₂	sulfur dioxide
T/day	tons per day
T/mo	tons per month
T/yr	tons per year
U.S.C.	United States Code
UTM	Universal Transverse Mercator
VOC	volatile organic compound
VOL	volatile organic liquid

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00009

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

1. FACILITY-WIDE CONDITIONS

The following table contains a summary of requirements that apply generally to emissions units at the facility.

Table 1.1 Facility-wide Applicable Requirements Summary

Permit Condition	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring, Recordkeeping, and Reporting Requirements
1.1	Fugitive emissions	Reasonable control and no more than three minutes in any 60-minute period leaving the property boundary of the permitted facility	IDAPA 58.01.01.650-651, PTC No. 027-00009	1.2, 1.3, 1.4, 1.26, 1.27
1.5	Odors	No emissions of odorous gas, liquids, or solids	IDAPA 58.01.01.775-776	1.6, 1.26, 1.27
1.7	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8, 1.26, 1.27
1.9	Excess emissions	Compliance with IDAPA 58.01.01.130-136	IDAPA 58.01.01.130-136	1.9.1-1.9.5, 1.26, 1.27
1.10	Open burning	Compliance with IDAPA 58.01.01.600-616	IDAPA 58.01.01.600-616	1.10, 1.26
1.11	Renovation and demolition	Compliance with 40 CFR 61, Subpart M	40 CFR 61, Subpart M	1.11, 1.26
1.12	Chemical accident prevention	Compliance with 40 CFR 68	40 CFR 68	1.12, 1.26
1.13	Fuel sulfur content	ASTM Grade 1 fuel oil – 0.3% by weight ASTM Grade 2 fuel oil – 0.5% by weight	IDAPA 58.01.01.728	1.13, 1.26
1.14	Fuel-burning equipment	Compliance with IDAPA 58.01.01.676-677	IDAPA 58.01.01.676-677	1.14, 1.26
1.15	Recycling and emissions reduction	Compliance with 40 CFR 82, Subpart F	40 CFR 82, Subpart F	1.15, 1.26

Fugitive Emissions

- 1.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. Visible emissions shall not be observed leaving the property boundary of the permitted facility for a period or periods aggregating more than three minutes in any 60-minute period.
[IDAPA 58.01.01.650-651, 5/1/94; PTC No. 027-00009, 12/10/01]
- 1.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
[IDAPA 58.01.01.322.06, 07, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00009

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- 1.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
[IDAPA 58.01.01.322.06, 07, 5/1/94]
- 1.4 The permittee shall conduct a quarterly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions, to ensure that the methods used to reasonably control fugitive emissions are effective. The fugitive emissions inspection shall consist of a see/no see evaluation of each potential source. If any fugitive emissions are present, the permittee shall perform a Method 22 visible emissions test at the property boundary in accordance with the procedures outlined in IDAPA 58.01.01.625. If visible emissions are observed leaving the property boundary for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance to the Department in writing within 72 hours. The permittee shall maintain records of the results of each quarterly fugitive emission inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.
[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00; PTC No. 027-00009, 12/10/01]

Odors

- 1.5 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.
[IDAPA 58.01.01.775-776, 5/1/94]
- 1.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
[IDAPA 58.01.01.322.06, 07 (state-only), 5/1/94]

Visible Emissions

- 1.7 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.
[IDAPA 58.01.01.625, 4/5/00]
- 1.8 In addition to the specific requirements in Permit Conditions 2.15, 5.12, and 6.2, the permittee shall conduct a quarterly facility-wide inspection of potential point sources of visible emissions during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation of each potential source. If any visible emissions are present from any point of emission, the permittee shall take appropriate corrective action as expeditiously as practicable. If the corrective action does not eliminate the visible emissions, then a Method 9, or Method 22 in the case of the flare, visible emissions observation must be conducted as soon as possible, but in no case later than 48 hours after the failure of the corrective action to remedy the visible emissions. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00009

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in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedence in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each quarterly visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

Excess Emissions

1.9 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between the subsections of Permit Condition 1.9 and the regulations of IDAPA 58.01.01.130-136.

1.9.1 The person responsible for, or in charge of, a facility during an excess emissions event shall, with all practicable speed, initiate and complete appropriate and reasonable action to correct the conditions causing such excess emissions event, to reduce the frequency of occurrence of such events, to minimize the amount by which the emission standard is exceeded, and shall, as provided below or upon request of the Department, submit a full report of such occurrence including a statement of all known causes and of the scheduling and nature of the actions to be taken.

[IDAPA 58.01.01.132, 4/5/00]

1.9.2 In all cases where startup, shutdown, or scheduled maintenance of any equipment or emission unit is expected to result or results in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.133.01(a) through (d), including, but not limited to, the following:

[IDAPA 58.01.01.133, 4/5/00]

1.9.2.1 A prohibition of any scheduled startup, shutdown, or maintenance resulting in excess emissions shall occur during any period in which an Atmospheric Stagnation Advisory and/or a Wood Stove Curtailment Advisory have been declared by the Department.

[IDAPA 58.01.01.133.01.a, 3/20/97]

1.9.2.2 Notifying the Department of the excess emissions event as soon as reasonably possible, but no later than two hours prior to the start of the excess emission event, unless the owner or operator demonstrates to the Department's satisfaction that a shorter advanced notice was necessary.

[IDAPA 58.01.01.133.01.b, 4/5/00]

1.9.2.3 The owner or operator of a source of excess emissions shall report and record the information required pursuant to Facility-wide Permit Conditions 1.9.4 and 1.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.

[IDAPA 58.01.01.133.01.c, 3/20/97]

1.9.3 In all cases where upset or breakdown of equipment or an emissions unit, or the initiation of safety measures, results or may result in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.134.01(a) and (b) and the following:

[IDAPA 58.01.01.134, 4/5/00]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00009

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1.9.3.1 For all equipment or emissions units from which excess emissions result during upset or breakdown conditions, or for other situations that may necessitate the implementation of safety measures which cause excess emissions, the facility owner or operator shall comply with the following:

[IDAPA 58.01.01.134.02, 4/5/00]

- The owner or operator shall immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event and to minimize the impact of such excess emissions on the ambient air quality and public health.

[IDAPA 58.01.01.134.02.a, 4/5/00]

- The owner or operator shall notify the Department of any upset, breakdown, or safety event that results in excess emissions. Such notification shall identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as soon as reasonably possible, but no later than 24 hours after the event, unless the owner or operator demonstrates to the Department's satisfaction that the longer reporting period was necessary.

[IDAPA 58.01.01.134.02.b, 4/5/00]

- The owner or operator shall report and record the information required pursuant to Facility-wide Permit Conditions 1.9.4 and 1.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.

[IDAPA 58.01.01.134.02.c, 3/20/97]

1.9.3.2 During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, the Department may require the owner or operator to immediately reduce or cease operation of the equipment or emissions unit causing the excess emissions until such time as the condition causing the excess emissions has been corrected or brought under control. Such action by the Department shall be taken upon consideration of the factors listed in IDAPA 58.01.01.134.03 and after consultation with the facility owner or operator.

[IDAPA 58.01.01.134.03, 4/5/00]

1.9.4 A written report for each excess emissions event shall be submitted to the Department by the owner or operator no later than 15 days after the beginning of such an event. Each report shall contain the information specified in IDAPA 58.01.01.135.02.

[IDAPA 58.01.01.135.01, 3/20/97; IDAPA 58.01.01.135.02, 4/5/00]

1.9.5 The owner or operator shall maintain excess emissions records at the facility for the most recent five-calendar-year period. The excess emissions records shall be made available to the Department upon request. The excess emissions records shall include the information requested by IDAPA 58.01.01.136.03(a) and (b) as summarized in the following:

[IDAPA 58.01.01.136.01, 02, 3/20/97; IDAPA 58.01.01.136.03, 4/5/00]

1.9.5.1 An excess emissions record book for each emissions unit or piece of equipment containing copies of all reports that have been submitted to the Department pursuant to IDAPA 58.01.01.135 for the particular emissions unit or equipment.

[IDAPA 58.01.01.136.03.a, 4/5/00]

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- 1.9.5.2 Copies of all startup, shutdown, and scheduled maintenance procedures and upset, breakdown, and safety preventative maintenance plans that have been developed by the owner or operator in accordance with IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.

[IDAPA 58.01.01.136.03.b, 3/20/97; IDAPA 58.01.01.130-136, 4/5/00
(state-only; federally enforceable upon approval into the SIP); IDAPA 58.01.01.322.08.b, 3/23/98]

Open Burning

- 1.10 The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, *Rules for Control of Open Burning*.

[IDAPA 58.01.01.600-616, 5/1/94]

Renovation/Demolition

- 1.11 The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

[40 CFR 61, Subpart M]

Regulated Substances for Accidental Release Prevention

- 1.12 An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR 68 no later than the latest of the following dates:

- Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130.
- The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR 68.10(a)]

Sulfur Content

- 1.13 No person shall sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:

- ASTM Grade 1 fuel oil - 0.3% by weight
- ASTM Grade 2 fuel oil - 0.5% by weight

[IDAPA 58.01.01.728, 5/1/94]

Fuel-burning Equipment

- 1.14 Unless specified elsewhere in the permit, the following shall apply to fuel-burning equipment at the facility:

- For fuel-burning equipment commencing operation on or after October 1, 1979, with a rated input of 10 MMBtu/hr or more, the permittee shall not discharge to the atmosphere PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas, 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid, 0.050 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal, and 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products.

[IDAPA 58.01.01.676, 5/1/94]

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- For fuel-burning equipment commencing operation prior to October 1, 1979, or with a rated input less than 10 MMBtu/hr, the permittee shall not discharge to the atmosphere PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas, 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid, 0.100 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal, and 0.200 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products.

[IDAPA 58.01.01.677, 5/1/94]

Recycling and Emissions Reductions

- 1.15 The permittee shall comply with applicable standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, Recycling and Emissions Reduction.

[40 CFR 82, Subpart F]

New Source Performance Standards

The following conditions apply to each NSPS source at the facility:

- 1.16 All requests, reports, applications, submittals, and other communications to the Administrator pursuant to 40 CFR 60, shall be submitted in duplicate to the EPA Region 10, Director of the Office of Air Quality. All information required to be submitted to the EPA for applicable NSPS requirements, must also be submitted to the Department.

[40 CFR 60.4]

- 1.17 A notification of any physical or operational change to an existing facility that may increase the emissions rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in 40 CFR 60.14(e). This notice shall be postmarked 60 days, or as soon as practicable, before the change is commenced and shall include information describing the precise nature of the change, present and proposed emissions control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The Administrator may request additional relevant information subsequent to this notice.

[40 CFR 60.7(a)(4)]

- 1.18 Any owner or operator subject to the provisions of this part shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, any malfunction of the air pollution control equipment, or any periods during which a continuous monitoring system or monitoring device is inoperative.

[40 CFR 60.7(b)]

- 1.19 The opacity standards set forth in this part shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard.

[40 CFR 60.11(c)]

- 1.20 At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[40 CFR 60.11(d)]

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- 1.21 For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard in this part, nothing in this part shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.
[40 CFR 60.11(g)]
- 1.22 No owner or operator subject to the provisions of this part shall build, erect, install, or use any article, machine, equipment, or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard, that is based on the concentration of a pollutant in the gases discharged to the atmosphere.
[40 CFR 60.12]
- 1.23 A change to an existing facility may constitute a modification or reconstruction as described in 40 CFR 60.14 and 15, respectively. The source can request a determination of reconstruction or modification as described in 40 CFR 60.5.
[40 CFR 60.5, 14, 15]

Compliance Testing

- 1.24 If testing is required, the permittee shall provide notice of intent to test to the Department at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by Department approval. The Department may, at its option, have an observer present at any emissions tests conducted on a source. The Department requests that such testing not be performed on weekends or state holidays.

All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior Department approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by the Department for any testing deviations, the Department may determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any compliance test, the permittee is encouraged to submit for approval to the Department, in writing, at least 30 days in advance, the following:

- The type of test method to be used
- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

Within 30 days following the date in which a compliance test required by this permit is concluded, the permittee shall submit a report to the Department for the respective test. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.

The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the following address:

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00009

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Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 N. Orchard
Boise, ID 83706-2239
Telephone: (208) 373-0550 Fax: (208) 373-0287

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

Test Methods

- 1.25 If testing is required, the permittee shall use the test methods listed in Table 1.2 to measure the pollutant emissions.

Table 1.2 EPA Reference Test Methods

Pollutant	Test Method*	Special Conditions
PM ₁₀	EPA Method 201.a EPA Method 202	
PM	EPA Method 5	
NO _x	EPA Method 7	
SO ₂	EPA Method 6	
CO	EPA Method 10	
VOC	EPA Method 25	
Opacity	EPA Method 9	If an NSPS source, IDAPA 58.01.01.625 and Method 9; otherwise, IDAPA 58.01.01.625 only.

*or Department-approved alternative in accordance with IDAPA 58.01.01.157

Monitoring and Recordkeeping

- 1.26 The permittee shall maintain sufficient recordkeeping to assure compliance with all of the terms and conditions of this operating permit. Recording of monitoring information shall include, but not be limited to, the following information: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to Department representatives upon request.

[IDAPA 58.01.01.322.07, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00009

Permittee: J.R. Simplot Co., Food Group

Date Issued: October 4, 2002

Location: Caldwell, Idaho

Date Expires: October 4, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Reports and Certifications

- 1.27 All periodic reports and certifications required by this permit shall be submitted to the Department within 30 days of the end of each specified reporting period. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130-136. Reports, certifications, and notifications shall be submitted to:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 N. Orchard
Boise, ID 83706-2239

The periodic compliance certification required by General Provision 21 shall also be submitted to the EPA within 30 days of the end of the specified reporting period, at the following address:

EPA Region 10
Air Operating Permits, OAQ-107
1200 Sixth Ave.
Seattle, WA 98101

[IDAPA 58.01.01.322.08, 11, 4/5/00]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00009

Permittee: J.R. Simplot Co., Food Group
Location: Caldwell, Idaho

Date Issued: October 4, 2002
Date Expires: October 4, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

2. EMISSIONS UNIT/PRODUCTION LINES NO. 1, 4, AND 6**Summary Description**

The following is a narrative description of the No. 1, 4, and 6 production lines regulated in this Tier I operating permit. This description is for informational purposes only. The Line No. 1 fryer was initially permitted as the Line No. 5 fryer in PTC No. 027-00009, dated December 31, 1997, and will be referred to as Line No. 1 throughout this operating permit unless otherwise noted.

The plant has three processing lines (No. 1, 4, and 6) located in Plant 2, each equipped with a blancher, a dryer, and a fryer. The Line No. 1 dryer and fryer were installed in 1995 and 1998, respectively; Line No. 4 dryer and fryer were installed in 1972 and 1970, respectively; and Line No. 6 dryer and fryer were installed in 1968 and 1970, respectively. The rated capacities of the Line No. 1, 4 and 6 dryers are 5.5, 16, and 28 MMBtu/hr, respectively. The rated capacities of the Line No. 1, 4, and 6 fryers are 75,000; 260,000; and 270,000 pounds per eight-hour shift. Each dryer is typically one large unit that is vented directly to the atmosphere. The fryers are primarily vented to a wet electrostatic precipitator. Table 2.1 lists the unit numbers associated with each unit.

Table 2.1 Emissions Unit Identification Numbers

Production Line No. 1		Production Line No. 4		Production Line No. 6	
Dryer	Fryer	Dryer	Fryer	Dryer	Fryer
S-C-D1	S-C-F1	S-C-D4	S-C-F4	S-C-D6	S-C-F6

Table 2.2 below describes the devices used to control emissions from production line fryers 1, 4, and 6.

Table 2.2 Emissions Units and Emissions Control Devices

Emission Unit(s) / Process(es)	Emission Control Device
Production Line No. 1 fryer	Wet ESP
Production Line No. 4 fryer	Wet ESP
Production Line No. 6 fryer	Wet ESP

Table 2.3 contains a summary of the requirements that apply to the No. 1, 4, and 6 production lines. Specific permit requirements are listed below Table 2.3.

Table 2.3 Applicable Requirements Summary

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring, Recordkeeping, and Reporting Requirements
2.1, 2.2	PM	Process weight	IDAPA 58.01.01.701-702	None required
2.3	PM (line No. 1)	10.88 lb/hr and 47.65 T/yr	PTC No. 027-00009	2.13, 2.14, 2.18
2.4	Visible emissions (line No. 1)	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625, PTC No. 027-00009	2.15, 2.16
2.5	Throughput (line No. 1)	41, 908 T/yr in any consecutive 12-month period	PTC No. 027-00009	2.11, 2.16
2.8	Pressure drop	Within 30% of most recent performance test	PTC No. 027-00009	2.12, 2.16, 2.17
2.9	Scrubber flow rate	Within 30% of most recent performance test	PTC No. 027-00009	2.12, 2.16, 2.17

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00009

Permittee: J.R. Simplot Co., Food Group
Location: Caldwell, Idaho

Date Issued: October 4, 2002
Date Expires: October 4, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Permit Limits / Standard Summary

- 2.1 None of the Line No. 4 and Line No. 6 dryers or fryers shall emit to the atmosphere PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour (lb/hr), and PW is the process weight in pounds per hour :
- a. If PW is less than 17,000 lb/hr,
$$E = 0.045(PW)^{0.60}$$
 - b. If PW is equal to or greater than 17,000 lb/hr,
$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00]
- 2.2 The Line No. 1 dryer or fryer shall not emit to the atmosphere PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:
- a. If PW is less than 9,250 lb/hr,
$$E = 0.045(PW)^{0.60}$$
 - b. If PW is equal to or greater than 9,250 lb/hr,
$$E = 1.10(PW)^{0.25}$$

[IDAPA 58.01.01.701, 4/5/00]
- 2.3 The PM emissions from the line No. 1 fryer stack shall not exceed 10.88 lb/hr or 47.65 T/yr.
[PTC No. 027-00009, 12/31/97]
- 2.4 For line No. 1 fryer, the permittee shall comply with Permit Condition 1.7
[IDAPA 58.01.01.625, 5/1/94; PTC No. 027-00009, 12/31/97]
- 2.5 The maximum throughput of preformed potato product to the Line No. 1 fryer shall not exceed 41,908 T/yr, measured as finished product, in any consecutive 12-month period.
[PTC No. 027-00009, 12/31/97]
- 2.6 The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer specifications, equipment to continuously measure the pressure differential across the air pollution control equipment and the scrubbing media flow rate to the air pollution control equipment.
[PTC No. 027-00009, 12/31/97]
- 2.7 In accordance with PTC No. 027-00009, dated December 31, 2001, the permittee shall have developed an O&M manual for the air pollution control device which describes the procedures that will be followed to maintain good working order and assure operation as efficiently as practical, and in accordance with Permit Conditions 2.8 and 2.9. The manual shall remain onsite at all times and shall be made available to Department representatives upon request.
[PTC No. 027-00009, 12/31/97]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00009

Permittee: J.R. Simplot Co., Food Group
Location: Caldwell, Idaho

Date Issued: October 4, 2002
Date Expires: October 4, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- 2.8 The pressure drop across the air pollution control device shall not be below 30% of the lowest pressure drop reading measured during the most recent performance test that demonstrated compliance with this permit and the O&M manual operating pressure drop (loss or gain) specifications.
[PTC No. 027-00009, 12/31/97]
- 2.9 The scrubbing media flow rate to the air pollution control device shall not be below 30% of the lowest flow rate measured during the most recent performance test that demonstrated compliance with this permit and the O&M manual's scrubbing media flow rate specifications.
[PTC No. 027-00009, 12/31/97]
- 2.10 The Line No. 1, 4, and 6 dryers shall be fired by natural gas exclusively.
[IDAPA 58.01.01.322.01, 3/19/99]

Monitoring & Recordkeeping Requirements

- 2.11 The permittee shall monitor and record the throughput to the Line No. 1 fryer, measured as finished product, once per month. This information shall be recorded as tons per month (T/mo). The throughput records shall be kept at the facility for the most recent five-year period and shall be made available to Department representatives upon request.
[IDAPA 58.01.01.322.07, 5/1/94; PTC No. 027-00009, 12/31/97; Consent Order, 10/7/99]
- 2.12 The permittee shall monitor and record the pressure drop and scrubbing media flow rate of the air pollution control device once per week. The pressure drop and scrubbing media flow rate records shall be kept at the facility for the most recent five-year period and shall be made available to Department representatives upon request.
[IDAPA 58.01.01.322.07, 5/1/94; PTC No. 027-00009, 12/31/97; Consent Order, 10/7/99]
- 2.13 Within the first year of issuance of this permit, the permittee shall conduct a compliance test for PM emissions in the Line No. 1 fryer exhaust gas stream as specified in Permit Condition 1.24. The permittee shall monitor and record the throughput of the Line No. 1 fryer during the test.
[IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94; PTC No. 027-00009, 12/31/97]
- 2.14 If the PM emission rate measured in the initial compliance test is less than or equal to 75% of the emission rate limits in Permit Condition 2.4, no further testing shall be required during the permit term. If the PM emission rate measured during the initial compliance test is greater than 75%, but less than or equal to 90% of the emission rate limit in Permit Condition 2.4, a second test shall be required in the third year of the permit term. If the PM emission rate measured during the initial compliance test is greater than 90% of the PM emission rate limit in Permit Condition 2.4, the permittee shall conduct a compliance test annually.
[IDAPA 58.01.01.322.06, 09, 5/1/94]
- 2.15 For the Line No. 1 fryer, the permittee shall comply with Permit Condition 1.8.
[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

Reporting

- 2.16 The permittee shall submit a summary compliance report to the Department and EPA every six months for the monitoring required in Permit Conditions 2.11, 2.12, and 2.15. The report is to be received no later than 30 days after the end of each six-month period, and shall clearly identify any deviations from the conditions specified in this permit.
[IDAPA 58.01.01.322.08, 11, 4/5/00]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00009

Permittee: J.R. Simplot Co., Food Group
Location: Caldwell, Idaho

Date Issued: October 4, 2002
Date Expires: October 4, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- 2.17 The permittee shall submit monthly reports to the Department and EPA of occurrences when the measurements of the pressure drop and scrubbing media flow rate of the air pollution control equipment are less than 30% of the lowest values obtained during the most recent compliance test that demonstrated compliance with this permit.
[IDAPA 58.01.01.322.08, 11, 4/5/00; PTC No. 027-00009, 12/31/97]
- 2.18 The permittee shall report the results of the compliance test required in Permit Condition 2.13 to the Department and EPA in a written report to be received no later than 30 days after completion of the test. If additional performance testing is performed in accordance with Permit Condition 2.14, the permittee shall report the results to the Department and EPA in a written report to be received no later than 30 days after completion of the test.
[IDAPA 58.01.01.322.08, 11, 4/5/00]
- 2.19 All documents, including, but not limited to, records, monitoring data, supporting information, testing reports, or compliance certifications submitted to the Department shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
[IDAPA 58.01.01.322.08, 4/5/00; PTC No. 027-00009, 12/31/97]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00009**Permittee:** J.R. Simplot Co., Food Group**Date Issued:** October 4, 2002**Location:** Caldwell, Idaho**Date Expires:** October 4, 2005*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.***3. EMISSIONS UNIT/STEAM GENERATING PLANT****Summary Description**

The following is a narrative description of the steam generating plant regulated in this Tier I operating permit. This description is for informational purposes only.

The steam generating plant consists of three natural gas-fired boilers that supply steam to the potato processing plant and the ethanol plant. The Kewanee boiler (Unit No. S-C-B8) was installed in 1966 and has a rated capacity of 80.8 MMBtu/hr. The remaining two boilers are both Cleaver-Brooks boilers with rated capacities of 102.8 MMBtu/hr. The first Cleaver-Brooks boiler (Unit No. S-C-B9) was installed in 1969, and the second Cleaver-Brooks boiler (Unit No. S-C-B10) was installed in 1972. There are currently no control devices on the boilers.

Table 3.1 contains a summary of the requirements that apply to the steam generating plant. Specific permit requirements are listed below Table 3.1.

Table 3.1 Applicable Requirements Summary

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring, Recordkeeping, and Reporting Requirements
3.1	PM	0.015 gr/dscf at 3% oxygen	IDAPA 58.01.01.677	3.2
3.2	Fuel type	Natural gas only	IDAPA 58.01.01.322.01	1.26

Permit Limits / Standard Summary

- 3.1 A person shall not discharge to the atmosphere from any fuel burning equipment in operation prior to October 1, 1979, PM in excess of 0.015 gr/dscf corrected to 3% oxygen. [IDAPA 58.01.01.677, 5/1/94]
- 3.2 The three boilers shall be fired by natural gas exclusively. [IDAPA 58.01.01.322.01, 3/19/99]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00009

Permittee: J.R. Simplot Co., Food Group
Location: Caldwell, Idaho

Date Issued: October 4, 2002
Date Expires: October 4, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

4. EMISSIONS UNIT/HEATER S-C-H5**Summary Description**

The following is a narrative description of the heater regulated in this Tier I operating permit. This description is for informational purposes only.

There is one natural gas-fired heating unit (S-C-H5) used to heat the plant that does not qualify as an insignificant activity. This heater has a rated capacity of 10.1 MMBtu/hr and was installed on January 15, 1991. Emissions from the heaters are released to the atmosphere through room vents. Combustion emissions for the heaters are based on continuous operation at burner capacity, assuming all emissions are released to the atmosphere.

Table 4.1 contains a summary of the requirements that apply to the heater. Specific permit requirements are listed below Table 4.1.

Table 4.1 Applicable Requirements Summary

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring, Recordkeeping, and Reporting Requirements
4.1	PM	0.015 gr/dscf at 3% O ₂	IDAPA 58.01.01.676	4.2
4.2	Fuel type	Natural gas only	IDAPA 58.01.01.322.01	1.26

Permit Limits / Standard Summary

- 4.1 A person shall not discharge to the atmosphere from any fuel-burning equipment in operation on or after October 1, 1979, with a maximum rated input equal to or exceeding 10 MMBtu/hr, PM in excess of 0.015 gr/dscf corrected to 3% oxygen.

[IDAPA 58.01.01.676, 5/1/94]

- 4.2 The heater shall be fired by natural gas exclusively.

[IDAPA 58.01.01.322.01, 3/19/99]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00009

Permittee: J.R. Simplot Co., Food Group
 Location: Caldwell, Idaho

Date Issued: October 4, 2002
 Date Expires: October 4, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

5. EMISSIONS UNIT/BIOGAS UNIT**Summary Description**

The following is a narrative description of the biogas unit regulated in this Tier I operating permit. This description is for informational purposes only.

Gases produced by the ADI-BVF anaerobic digester at the wastewater treatment facility are referred to as biogases. The biogas primarily consists of methane, carbon dioxide, and hydrogen sulfide (H₂S). These gases are collected and routed to a waste flare (Unit No. S-C-BF) equipped with a natural gas-fired pilot light. The flare combusts the biogas to form carbon dioxide, sulfur dioxide, and water, which are vented to the atmosphere. The ADI-BVF anaerobic digester and biogas flare were permitted for construction in PTC No. 027-00009, dated December 17, 1997. The PTC was amended on December 10, 2001.

Table 5.1 contains a summary of the requirements that apply to the biogas unit. Specific permit requirements are listed below Table 5.1.

Table 5.1 Applicable Requirements Summary

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring, Recordkeeping, and Reporting Requirements
5.1	SO ₂	Not to exceed 90.0 T/yr	PTC No. 027-00009	5.8, 5.13
5.2	H ₂ S	Not to exceed 5391 ppmv	PTC No. 027-00009	5.10, 5.11, 5.14
5.3	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625; PTC No. 027-00009	5.12, 5.13
5.4	COD	COD reduction in the digester shall not exceed 2,000,000 lb/mo	PTC No. 027-00009	5.8, 5.13
5.5	Flare operation	Flare shall be operated with pilot flame	PTC No. 027-00009	5.9, 5.13
5.7	PM	0.2 lb PM/100 lb of biogas burned	IDAPA 58.01.01.786.01	5.12, 5.13

Permit Limits / Standard Summary

- 5.1 Sulfur dioxide emissions from the ADI-BVF digester flare stack shall not exceed 90.0 T/yr.
[PTC No. 027-00009, 12/10/01]
- 5.2 The H₂S concentration in the biogas shall not exceed a maximum of 5391 ppmv.
[PTC No. 027-00009, 12/10/01]
- 5.3 The permittee shall comply with Permit Condition 1.7.
[IDAPA 58.01.01.625, 5/1/94; PTC No. 027-00009, 12/10/01]
- 5.4 The COD reduction of the wastewater in the ADI-BVF anaerobic digester shall be limited to an average 2.0 million pounds per month during any 12-month period.
[PTC No. 027-00009, 12/10/01]
- 5.5 The ADI-BVF anaerobic digester flare shall be operated with a pilot flame present at all times during the operation of the digester.
[PTC No. 027-00009, 12/10/01]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00009

Permittee: J.R. Simplot Co., Food Group
Location: Caldwell, Idaho

Date Issued: October 4, 2002
Date Expires: October 4, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- 5.6 As required in PTC 027-00009, dated December 10, 2001, the permittee shall have developed an O&M manual for the AVI-BVF digester flare that describes the procedures that will be followed to maintain good working order and assure operation as efficiently as practical, in accordance with manufacturer specifications. The manual shall remain onsite at all times and shall be made available to Department representatives upon request.

[PTC No. 027-00009, 12/10/01]

- 5.7 Particulate emissions from the waste flare shall not exceed 0.2 lb/100 lb of biogas burned.

[IDAPA 58.01.01.786.01, 4/5/00]

Monitoring & Recordkeeping Requirements

- 5.8 The COD reduced in the ADI-BVF digester shall be monitored and recorded once on a monthly basis. Monthly values shall be used to calculate consecutive 12-month averages. A compilation of the most recent five years of data shall be kept onsite and shall be made available to Department representatives upon request.

[PTC No. 027-00009, 12/10/01]

- 5.9 The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer specifications, a thermocouple or other equivalent device, which detects the presence of the flame. When a pilot flame is not present, the following information shall be recorded in a log: the date, the duration time the flame was not present, the reason the flame was not present, and any corrective action or maintenance taken. A compilation of the most recent five years of data shall be kept onsite and shall be made available to Department representatives upon request.

[PTC No. 027-00009, 12/10/01]

- 5.10 Within the first year of issuance of this permit, the permittee shall conduct a compliance test for H₂S as specified in Permit Condition 1.24.

[IDAPA 58.01.01.322.06, 09, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00; PTC No. 027-00009, 12/10/01]

- 5.11 If the H₂S concentration measured in the initial compliance test is less than or equal to 75% of the concentration limit in Permit Condition 5.2, no further testing shall be required during the permit term. If the H₂S concentration measured during the initial compliance test is greater than 75%, but less than or equal to 90% of the concentration limit in Permit Condition 5.2, a second test shall be required in the third year of the permit term. If the H₂S concentration measured during the initial compliance test is greater than 90% of the concentration limit in Permit Condition 5.2, the permittee shall conduct a compliance test annually.

[IDAPA 58.01.01.322.06, 09, 5/1/94]

- 5.12 The permittee shall comply with Permit Condition 1.8.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00009

Permittee: J.R. Simplot Co., Food Group

Date Issued: October 4, 2002

Location: Caldwell, Idaho

Date Expires: October 4, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Reporting

- 5.13 The permittee shall submit a summary compliance report to the Department and EPA every six months for the monitoring required in Permit Conditions 5.8, 5.9, and 5.12. The report is to be received no later than 30 days after the end of each six-month period, and shall clearly identify any deviations from the conditions specified in this permit.
[IDAPA 58.01.01.322.08, 11, 4/5/00]
- 5.14 The permittee shall report the results of the performance test required in Permit Condition 5.10 to the Department and EPA in a written report to be received no later than 30 days after completion of the test. If additional performance testing is performed in accordance with Permit Condition 5.11, the permittee shall report the results to the Department and EPA in a written report to be received no later than 30 days after completion of the test.
[IDAPA 58.01.01.322.08, 11, 4/5/00]
- 5.15 All documents, including, but not limited to, records, monitoring data, supporting information, testing reports, or compliance certifications submitted to the Department shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
[IDAPA 58.01.01.322.08, 11, 4/5/00; PTC No. 027-00009, 12/10/01]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00009**Permittee:** J.R. Simplot Co., Food Group**Date Issued:** October 4, 2002**Location:** Caldwell, Idaho**Date Expires:** October 4, 2005*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.***6. EMISSIONS UNIT/ETHANOL PRODUCTION PLANT****Summary Description**

The following is a narrative description of the ethanol production plant regulated in this Tier I operating permit. This description is for informational purposes only.

There are two air emission point sources associated with the ethanol plant, and both sources primarily emit VOCs. The first is referred to as ethanol production (Unit No. S-C-E1), while the second source is the tank vents on the ethanol storage tanks (Unit No. S-C-E2).

Emissions from ethanol production (cooking, fermentation, and distillation) are collected and vented to the atmosphere. The emission factor used to estimate VOC emissions from ethanol production is taken from EPA Document No. EPA 450/4-90-003. There are currently no controls for emissions from the ethanol production plant.

Emission estimates for the storage tanks are based on the Storage Tank Emissions Calculation Software (version 2.0) distributed by the EPA. The ethanol storage tanks are subject to monitoring requirements under NSPS (40 CFR 60, Subpart Kb).

Table 6.1 contains a summary of the requirements that apply to the ethanol production plant. Specific permit requirements are listed below Table 6.1.

Table 6.1 Applicable Requirements Summary

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring, Recordkeeping, and Reporting Requirements
6.1	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	6.2, 6.5

Permit Limits / Standard Summary

6.1 The permittee shall comply with Permit Condition 1.7.

[IDAPA 58.01.01.625, 4/5/00]

Monitoring & Recordkeeping Requirements

6.2 The permittee shall comply with Permit Condition 1.8.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

6.3 For each of the four ethanol storage tanks, the permittee shall maintain records specifying the dimensions of the tank and an analysis showing the capacity of the tank. These records shall be readily accessible, and shall be maintained for the life of the source.

[40 CFR 60.116b(b)]

6.4 For each of the four ethanol storage tanks, the permittee shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the period of storage. The maximum true vapor pressure of that VOL during the period of storage shall be calculated in accordance with 40 CFR 60.116b(e).

[40 CFR 60.116b(c)]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00009

Permittee: J.R. Simplot Co., Food Group

Date Issued: October 4, 2002

Location: Caldwell, Idaho

Date Expires: October 4, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Reporting

- 6.5 The permittee shall submit a summary compliance report to the Department and EPA every six months for the monitoring required in Permit Conditions 6.2 and 6.4. The report is to be received no later than 30 days after the end of each six-month period, and shall clearly identify any deviations from the conditions specified in this permit.

[IDAPA 58.01.01.322.08, 11, 4/5/00]

- 6.6 The permittee shall report the dimensions of each of the four ethanol storage tanks, and an analysis showing the capacities of each tank to the Department and EPA within 60 days of issuance of this permit.

[IDAPA 58.01.01.322.08, 11, 4/5/00]

- 6.7 All documents, including, but not limited to, records, monitoring data, supporting information, testing reports, or compliance certifications submitted to the Department shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

[IDAPA 58.01.01.322.08, 4/5/00]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00009**Permittee:** J.R. Simplot Co., Food Group**Date Issued:** October 4, 2002**Location:** Caldwell, Idaho**Date Expires:** October 4, 2005*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.***7. INSIGNIFICANT ACTIVITIES**

Activities and emission units identified as insignificant under IDAPA 58.01.01.317.01(b) are listed in the Tier I operating permit to qualify for a permit shield.

Table 7.1 Insignificant Activities

Description	Insignificant Activities IDAPA 58.01.01.317.01(b)(i) Citation
Storage tanks and vessels with less than 260 gallon capacity with appropriate closures	IDAPA 58.01.01.317.01(b)(i)(1)
Storage tanks and vessels with less than 1,100 gallon capacity with appropriate closures, not for use with HAPs, and with a maximum vapor pressure of 550 mmHg	IDAPA 58.01.01.317.01(b)(i)(2)
Unleaded gasoline storage tank and off-specification ethanol storage tank	IDAPA 58.01.01.317.01(b)(i)(3)
Propane storage tank	IDAPA 58.01.01.317.01(b)(i)(4)
Various natural gas-fired air makeup units rated less than 5 MMBtu/hr	IDAPA 58.01.01.317.01(b)(i)(5)
Various combustion sources rated less than 5 MMBtu/hr, containing less than 0.4% by weight sulfur for coal or less than 1% by weight for other fuels	IDAPA 58.01.01.317.01(b)(i)(6)
Diesel-fired emergency generators rated less than 1 MMBtu/hr	IDAPA 58.01.01.317.01(b)(i)(7)
Welding using less than 1 T/day	IDAPA 58.01.01.317.01(b)(i)(9)
Ink used to print on packaging using less than 2 gallons per day	IDAPA 58.01.01.317.01(b)(i)(12)
Various water-cooling towers that are non-process-contact coolers and not greater than 10,000 gallons per minute	IDAPA 58.01.01.317.01(b)(i)(13)
Water chlorination less than 20,000,000 gallons per day of water	IDAPA 58.01.01.317.01(b)(i)(16)
Natural gas, propane, or kerosene-fired space heaters rated less than 5 MMBtu/hr	IDAPA 58.01.01.317.01(b)(i)(18)
Equipment used to exclusively pump, load, and store vegetable oil	IDAPA 58.01.01.317.01(b)(i)(20)
Cleaning and stripping activities and equipment using solutions with less than 1% VOCs by weight	IDAPA 58.01.01.317.01(b)(i)(26)
Storage and handling of water-based lubricants for metal working with an organic content of less than 10%	IDAPA 58.01.01.317.01(b)(i)(27)
Heaters S-C-H4, S-C-H6, S-C-H7, S-C-H8, S-C-H9, S-C-H10, S-C-H11, and S-C-H12	IDAPA 58.01.01.317.01(b)(i)(30)

- 7.1 There are no monitoring, recordkeeping, or reporting requirements for insignificant emission units or activities beyond those required in the Facility-wide Permit Conditions.

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00009**Permittee:** J.R. Simplot Co., Food Group**Date Issued:** October 4, 2002**Location:** Caldwell, Idaho**Date Expires:** October 4, 2005*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.***8. COMPLIANCE SCHEDULE**

J.R. Simplot Co. is not in compliance at the time of issuance of the Tier I operating permit with the applicable PTC requirements for sources listed in Permit Condition 8.1. To bring the facility into compliance with the applicable requirements in the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.01, et seq., the permittee shall obtain a combined facility-wide Tier II operating permit and PTC (hereafter referred to as the facility-wide permit) and a modified Tier I operating permit. The specific elements of the compliance schedule are summarized in Table 8.1 and specified in Permit Conditions 8.2 through 8.9.

Table 8.1. Compliance Schedule

PERMIT CONDITIONS	MILESTONE	DEADLINE	DOCUMENTATION / REPORTING
8.2	Submit complete facility-wide permit application to comply with IDAPA 58.01.01.400 through 410	180 days after issuance of the Tier I operating permit	Completeness letter from the Department
8.3	Concurrently submit complete application information to address the applicable PTC requirements in IDAPA 58.01.01.200 through 223 for those sources for which the permittee was required to, but did not obtain, a PTC	180 days after issuance of the Tier I operating permit	Completeness letter from the Department
8.4	Submit supplemental application information to address the applicable PTC requirements for any additional sources identified	Within 30 days of a request in writing by the Department during processing of the facility-wide permit	Completeness letter from the Department
8.7	Submit a request to modify the Tier I operating permit	30 days after the facility-wide permit application is found complete	Completeness letter from the Department
8.8	Submit quarterly progress reports	January 1, April 1, July 1, and October 1 of each year	

8.1 The Department identified the following sources as sources that are not in compliance because of failure to obtain a permit to construct prior to construction or modification:

- The ethanol production plant
- The four ethanol storage tanks

The permittee has the continuing responsibility to submit any supplementary information needed, including information for any other sources, in accordance with IDAPA 58.01.01.315.

8.2 The J.R. Simplot Co. shall submit a complete permit application and all additional information requested by the Department for issuance of a facility-wide Tier II operating permit within 180 days of issuance of this Tier I operating permit. The application shall address the requirements for Tier II operating permits in accordance with IDAPA 58.01.01.400 through 410.

[IDAPA 58.01.01.322.10, 4/5/00]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00009

Permittee: J.R. Simplot Co., Food Group
Location: Caldwell, Idaho

Date Issued: October 4, 2002
Date Expires: October 4, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- 8.3 In addition to the requirements for Tier II operating permits, the facility-wide permit application shall include all of the applicable information and address the applicable requirements for PTCs in accordance with IDAPA 58.01.01.200 through IDAPA 58.01.01.223 and the NSPS requirements in 40 CFR 60, Subpart KB for the construction and/or modification of sources for which the permittee was required to, but did not obtain, a PTC. The Department has identified the sources listed in Permit Condition 8.1 as sources that failed to obtain a permit prior to construction or modification.
[IDAPA 58.01.01.322.10, 4/5/00]
- 8.4 If through the development of the facility-wide permit, it is determined that the facility should have obtained a PTC or a PTC modification for any other source or sources at the facility, the permittee shall submit a supplemental application that addresses the applicable requirements for PTCs within 30 days of receiving written notification from the Department.
[IDAPA 58.01.01.322.10, 4/5/00]
- 8.5 The application submittal deadlines set forth in the compliance schedule may be extended if the permittee clearly demonstrates that additional time is needed to collect new data for submittal of a complete application. Extension requests, with complete information to justify the request, must be submitted in writing to the Department no later than the midpoint of the milestone timeline. The deadlines may be extended for up to one year through written authorization from the Department.
[IDAPA 58.01.01.322.10, 4/5/00]
- 8.6 Upon receipt of a complete application, the Department will draft a single proposed facility-wide permit for the facility. The permit will contain all of the terms and conditions necessary to comply with the applicable requirements for PTCs in accordance with IDAPA 58.01.01.200 through 223 and the requirements for Tier II operating permits in accordance with IDAPA 58.01.01.400 through 410. The permit will clearly identify the origin and basis for each term and condition. The procedures for issuing a PTC under IDAPA 58.01.01.209 shall be followed concurrently with the procedures for issuing a Tier II operating permit under IDAPA 58.01.01.404.
[IDAPA 58.01.01.322.10, 4/5/00]
- 8.7 The J.R. Simplot Co. shall request a modification to their Tier I operating permit within 30 days after the combined facility-wide Tier II operating permit and PTC application is determined complete by the Department. The Tier I operating permit shall be modified to incorporate all applicable requirements of the facility-wide permit and shall be issued concurrently with the facility-wide permit in accordance with the procedures for issuing a Tier I permit in IDAPA 58.01.01.360 through 369.
[IDAPA 58.01.01.322.10, 4/5/00]
- 8.8 Until such time that a modified Tier I operating permit is issued pursuant to Permit Condition 8.7, J.R. Simplot shall submit a progress report each calendar quarter to the Department stating when each of the milestones and compliance with each condition in the compliance schedule were or will be achieved, and an explanation of why any dates were not or will not be met and a detailed description of any preventative or corrective measures undertaken by the permittee.
[IDAPA 58.01.01.322.10, 4/5/00]
- 8.9 This schedule of compliance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based.
[IDAPA 58.01.01.322.10, 4/5/00]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00009

Permittee: J.R. Simplot Co., Food Group

Date Issued: October 4, 2002

Location: Caldwell, Idaho

Date Expires: October 4, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

9. TIER I OPERATING PERMIT GENERAL PROVISIONS

General Compliance

1. The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation and is grounds for enforcement action, permit termination, revocation and reissuance, revision, or for denial of a permit renewal application.
[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]
2. It shall not be a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the terms and conditions of this permit.
[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]
3. Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.
[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

Reopening

4. This permit may be revised, reopened, revoked and reissued, or terminated for cause. Cause for reopening exists under any of the circumstances listed in IDAPA 58.01.01.386. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable in accordance with IDAPA 58.01.01.360 through 369.
[IDAPA 58.01.01.322.15.c, 5/1/94; IDAPA 58.01.01.386, 3/19/99; 40 CFR 70.7(f)(1) and (2); 40 CFR 70.6(a)(6)(iii)]
5. The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

Property Rights

6. This permit does not convey any property rights of any sort, or any exclusive privilege.
[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

Information Requests

7. The permittee shall furnish all information requested by the Department, within a reasonable time, that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.
[Idaho Code § 39-108; IDAPA 58.01.01.122, 5/1/94
IDAPA 58.01.01.322.15.f, 4/5/00; 40 CFR 70.6(a)(6)(v)]
8. Upon request, the permittee shall furnish to the Department copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code § 9-342A and applicable implementing regulations including IDAPA 58.01.01.128.
[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00009

Permittee: J.R. Simplot Company, Food Group

Date Issued: October 4, 2002

Location: Caldwell, Idaho

Date Expires: October 4, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Severability

9. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

Changes Requiring Permit Revision or Notice

10. The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee shall comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200-223, 4/5/00; IDAPA 58.01.01.322.15.i, 380-386, 3/19/99; 40 CFR 70.4(b)(12), (14) and (15), and 70.7(d) and (e)]

11. Changes that are not addressed or that are prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the Clean Air Act (CAA), 42 USC Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 USC Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. Section 502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off-permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381-385, 3/19/99; IDAPA 58.01.01.209.05, 5/1/94; 40 CFR 70.4(b)(14) and (15)]

Federal and State Enforceability

12. Unless specifically identified as a "state-only" provision, all terms and conditions in this permit, including any terms and conditions designed to limit a source's potential to emit, are enforceable: (a) by the Department in accordance with state law; and (b) by the United States or any other person in accordance with federal law.

[IDAPA 58.01.01.322.15.j, 5/1/94; 40 CFR 70.6(b)(1) and (2)]

13. Provisions specifically identified as a "state-only" provision are enforceable only in accordance with state law. "State-only" provisions are those that are not required under the CAA or under any of its applicable requirements or those provisions adopted by the state prior to federal approval.

[Idaho Code § 39-108; IDAPA 58.01.01.322.15.k, 3/23/98]

Inspection and Entry

14. Upon presentation of credentials, the permittee shall allow the Department, or an authorized representative of the Department to do the following:
- a. Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit.
 - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit.
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00009

Permittee: J.R. Simplot Company, Food Group
Location: Caldwell, Idaho

Date Issued: October 4, 2002
Date Expires: October 4, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.
[Idaho Code § 39-108; IDAPA 58.01.01.322.15.i, 3/19/99; 40 CFR 70.6(c)(2)]

New Requirements During Permit Term

15. The permittee shall comply with applicable requirements that become effective during the permit term on a timely basis.
[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.10.a.ii, 5/1/94; 40 CFR 70.6(c)(3) citing 70.5(c)(8)]

Fees

16. The owner or operator of a Tier I source shall pay annual registration fees to the Department in accordance with IDAPA 58.01.01.525 through IDAPA 58.01.01.538.
[IDAPA 58.01.01.322.15.n, 5/1/94; 40 CFR 70.6(a)(7)]

Certification

17. All documents submitted to the Department shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.
[IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

Renewal

18. a. The owner or operator of a Tier I source shall submit an application to the Department for a renewal of this permit at least six months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application nine months prior to the date of expiration.
[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]
- b. If a timely and complete application for a Tier I operating permit renewal is submitted, but the Department fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit, including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325, shall remain in effect until the renewal permit has been issued or denied.
[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

Permit Shield

19. Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:
- a. Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
- i. the Department has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00009

Permittee: J.R. Simplot Company, Food Group
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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- b. The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a PTC), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
- c. Nothing in this permit shall alter or affect the following:
 - i. Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers.
 - ii. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance.
 - iii. The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a).
 - iv. The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of the Department to obtain information from a source pursuant to Idaho Code § 39-108 and IDAPA 58.01.01.122.
[Idaho Code § 39-108 and 112; IDAPA 58.01.01.122, 322.15.m, 325, 5/1/94;
IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99;
40 CFR 70.6(f)]

Compliance Schedule and Progress Reports

- 20. a. For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
- b. For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
- c. For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.
- d. For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.
[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9, 10, 5/1/94; 40 CFR 70.6(c)(3) and (4)]

Periodic Compliance Certification

- 21. The permittee shall submit compliance certifications during the term of the permit for each emissions unit to the Department and the EPA as follows:
 - a. Compliance certifications for all emissions units shall be submitted annually beginning 12 months from the permit issuance date, or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by the Department.
 - b. The compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit including emissions limitations, standards, and work practices.
 - c. The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00009

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- i. The identification of each term or condition of the Tier I operating permit that is the basis of the certification.
 - ii. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required by this Tier I operating permit. If necessary, the owner or operator shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the CAA, which prohibits knowingly making a false certification or omitting material information.
 - iii. The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Paragraph 9.21.c.ii above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred.
 - iv. Such other facts as the Department may require to determine the compliance status of the source.
- d. All original compliance certifications shall be submitted to the Department and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11, 5/1/94; 40 CFR 70.6(c)(5)(iii) as amended,
62 Fed. Reg. 54900, 54946, 10/22/97; 40 CFR 70.6(c)(5)(iv)]

False Statements

22. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

No Tampering

23. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Semiannual Monitoring Reports

24. In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months starting six months from the date of permit issuance. All instances of deviations from this operating permit's requirements must be clearly identified in the report. All required reports must be certified in accordance with IDAPA 58.01.01.123.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 027-00009

Permittee: J.R. Simplot Company, Food Group
Location: Caldwell, Idaho

Date Issued: October 4, 2002
Date Expires: October 4, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Reporting Deviations and Excess Emissions

25. The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130-136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit.
[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 3/20/97; 40 CFR 70.6(a)(3)(iii)]

Permit Revision Not Required

26. No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit.
[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

Emergency

27. In accordance with IDAPA 58.01.01.332, and as defined in IDAPA 58.01.01.008, an "emergency" constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.
[IDAPA 58.01.01.332.01, 4/5/00; 40 CFR 70.6(g)]